Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Re- lief is Not Granted	Why a Less Restrictive Alternative to the Re- lief Sought is Not Avail- able	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Brief dated October 7, 2024 [ECF No. 404]	Motion describes, by characterization and quotation of documents produced by Save On SP, LLC ("SaveOn") during discovery: (1) SaveOn's business strategy for setting copay amounts, and (2) SaveOn's business practices and marketing materials for communicating with patients, comprising proprietary business information. See ECF No. 404.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business in- formation and strategy be disclosed to competi- tors and other market participants.	A redacted, public version of the brief is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 3 [ECF No. 404]	Exhibit 3 is an email chain between SaveOn employees and one of its health plan clients. Exhibit 3 discusses SaveOn's marketing material and business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative than filing the exhibit en- tirely under seal is avail- able to prevent the dis-	No	No objection

	practices, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 3.	information be disclosed to competitors and other market participants.	closure of SaveOn's proprietary business information.		
Mangi Declaration Ex. 4 [ECF No. 404]	Exhibit 4 is an internal SaveOn slide deck used to train SaveOn employees to speak with patients on SaveOnadvised plans. The deck reflects SaveOn's business and marketing practices, comprising proprietary business information. See ECF No. 404 Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 5 [ECF No. 404]	Exhibit 5 is an internal email chain between SaveOn employees Exhibit 5 discusses SaveOn's marketing material and business practices for communicating with its health plan clients, comprising proprietary business information. See ECF No. 404 Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 6 [ECF No. 404]	Exhibit 6 is SaveOn's supplemental Responses and Objections to Johnson & Johnson Healthcare Systems	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to	No	No objection

	Inc.'s ("J&J") Interrogatory No. 21. The R&Os disclose SaveOn's strategy for drafting marketing material regarding changes in J&J's copay assistance terms and conditions, comprising proprietary business information. See ECF No. 404 Ex. 6.	non-public business information and strategy be disclosed to competitors and other market participants.	prevent the disclosure of SaveOn's proprietary business information.		
Mangi Declaration Ex. 8 [ECF No. 404]	Exhibit 8 is a draft of a letter SaveOn created for patients in response to changes in J&J's copay assistance terms and conditions, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 9 [ECF No. 404]	Exhibit 9 is an internal SaveOn training document used to instruct SaveOn employees about how to speak with patients on SaveOn-advised plans. The document reflects SaveOn's business and marketing practices, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	business information.				
	See ECF No. 404 Ex. 9.				
Brief dated	Brief discloses SaveOn's	If relief is not granted,	A redacted, public ver-	No	No objection
November	business strategy for and	SaveOn would be at a	sion of the brief is being		
4, 2024	for marketing its services	competitive disadvantage	filed. It is believed that		
[ECF No.	and terms to health plan	should its proprietary	no less restrictive alter-		
431]	clients and patients,	non-public business in-	native is available to pre-		
	comprising proprietary	formation and strategy	vent the disclosure of		
	business information.	be disclosed to competi-	SaveOn's proprietary		
	See ECF No. 431.	tors and other market	business information.		
		participants.			
Nelson	Exhibit 1 is SaveOn's	If relief is not granted,	A redacted, public ver-	No	No objection
Declaration	supplemental Responses	SaveOn would be at a	sion of the R&Os is be-		
Ex. 1 [ECF	and Objections to J&J's	competitive disadvantage	ing filed. It is believed		
No. 431]	Interrogatory No. 21.	should its proprietary	that no less restrictive al-		
	The R&Os disclose	non-public business in-	ternative is available to		
	SaveOn's strategy for	formation and strategy	prevent the disclosure of		
	drafting marketing	be disclosed to competi-	SaveOn's proprietary		
	material regarding	tors and other market	business information.		
	changes in J&J's copay	participants.			
	assistance terms and				
	conditions, comprising				
	proprietary business				
	information. See ECF				
	No. 431 Ex. 1.				
Nelson	Exhibit 7 is an internal	If relief is not granted,	It is believed that no less	No	No objection
Declaration	email chain between	SaveOn would be at a	restrictive alternative		
Ex. 7 [ECF	SaveOn employees	competitive disadvantage	than filing the exhibit en-		
No. 431]	discussing a letter	should its proprietary	tirely under seal is avail-		
	SaveOn drafted to	non-public business	able to prevent the dis-		
	explain its services to	information be disclosed	closure of SaveOn's pro-		
	patients, comprising	to competitors and other	prietary business infor-		
	proprietary business	market participants.	mation.		

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	information. See ECF				
	No. 431 Ex. 7.				
Brief dated	Brief characterizes	If relief is not granted,	A redacted, public ver-	No	No objection
November	SaveOn's strategy for	SaveOn would be at a	sion of the Letter is be-		
26, 2024	determining which drugs	competitive disadvantage	ing filed. It is believed		
[ECF No.	to include on its list,	should its proprietary	that no less restrictive al-		
458]	comprising proprietary	non-public business in-	ternative is available to		
	business information.	formation and strategy	prevent the disclosure of		
	See ECF No. 458.	be disclosed to competi-	SaveOn's proprietary		
		tors and other market	business information.		
		participants.			